

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE  
1615 M STREET, N.W.  
SUITE 400  
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:

(202) 326-7999

August 23, 2021

*Via ECF*

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

As directed by the Court's order by memorandum endorsement of July 26, 2021, ECF No. 6983, I write on behalf of Defendant Kingdom of Saudi Arabia ("Saudi Arabia") to bring the Court up to date on the status of the parties' efforts to propose redactions in accordance with the Court's November 24, 2020 order, ECF No. 6541. The Plaintiffs' Executive Committees ("Plaintiffs"), the Federal Bureau of Investigation ("FBI"), and Defendant Dallah Avco all join in this letter.

As set forth in the parties' previous letter of July 23, 2021, ECF No. 6977, Plaintiffs indicated during a meet-and-confer on July 12 that they intend to make a proposal concerning the treatment of the redactions for the deposition transcripts of Khalil Al Khalil and Osman Kaldirim, as well as other redactions more generally, and that they will likely seek relief from the Court on these issues. Additionally, Plaintiffs contend that in light of the FBI's recent admission that its subfile investigation is now closed, that the FBI Protective Order should be lifted or substantially modified. Saudi Arabia, Dallah Avco, and the FBI will review and respond to Plaintiffs' proposal.

On August 19, 2021, Saudi Arabia circulated to the parties a preliminary list of additional filings beyond those set forth in the Court's November 24, 2020 order for which the parties should meet and confer concerning proposed redactions. Saudi Arabia's list identified at least the filings leading up to the Court's January 13, 2021 amended order and its March 12 and June 15, 2021 orders as requiring redaction review. Saudi Arabia will prepare proposed redactions for Saudi Arabia's protected information in those filings and will supplement the list of outstanding filings for redaction review as appropriate.

The FBI continues to review proposed redactions to filings provided by the parties, as well as deposition transcripts recently provided for review under the FBI Protective Order.

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Dallah Avco has reviewed the proposed redactions circulated to date. It takes no position on those redactions and does not itself propose any additional redactions.

Counsel for all parties will continue to work to move this process forward. Subject to the Court's approval, we propose to submit another joint status letter on or before September 22, 2021.

Respectfully submitted,

*/s/ Michael K. Kellogg*

Michael K. Kellogg  
*Counsel for the Kingdom of Saudi Arabia*

cc: All MDL Counsel of Record (via ECF)